

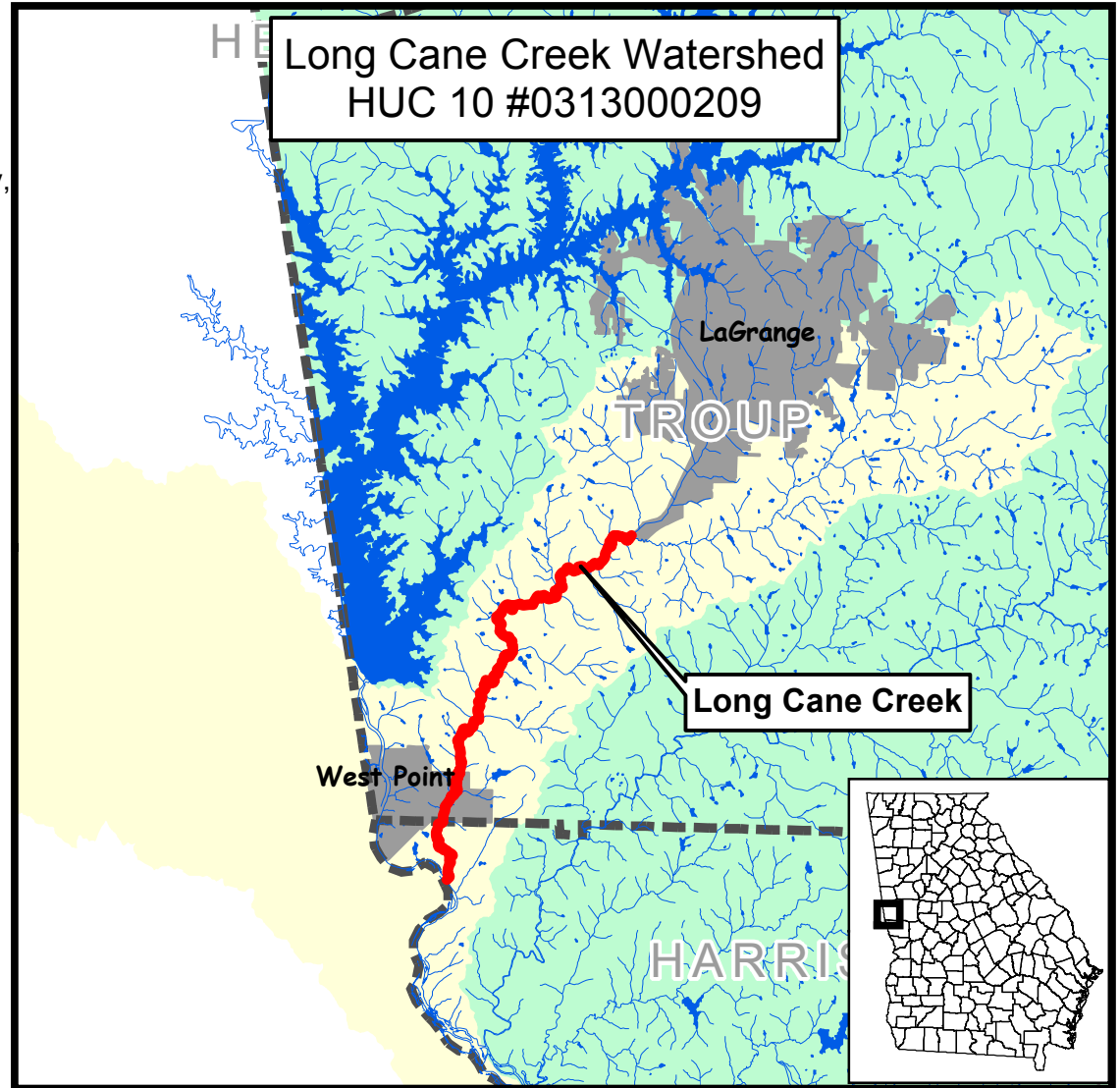
**STATE OF GEORGIA**  
**TIER 2 TMDL IMPLEMENTATION PLAN**    **REVISION \_\_**  
 Long Cane Creek  
 Chattahoochee River Basin

Local Watershed Governments; Troup County, Harris County,  
 City of West Point

**I. INTRODUCTION**

Total Maximum Daily Load (TMDL) Implementation Plans are platforms for evaluating and tracking water quality protection and restoration. These plans have been designed to accommodate continual updates and revisions as new conditions and information warrant. In addition, field verification of watershed characteristics and listing data has been built into the preparation of the plans. The overall goal of the plans is to define a set of actions that will help achieve water quality standards in the state of Georgia.

This implementation plan addresses the general characteristics of the watershed, the sources of pollution, stakeholders and public involvement, and education/outreach activities. In addition, the plan describes regulatory and voluntary practices/control actions (*management measures*) to reduce pollutants, milestone schedules to show the development of the management measures (*measurable milestones*), and a monitoring plan to determine the efficiency of the management measures.



**Table 1. IMPAIRMENTS**

IMPAIRED STREAM SEGMENT	IMPAIRED SEGMENT LOCATION	IMPAIRMENT
Long Cane Creek	Panther, Blue John & Long Cane Creeks, Troup County	Fecal Coliform Bacteria & Biota(sediment)
Tanyard Creek*	LaGrange	Fecal Coliform Bacteria
Blue John Creek*	LaGrange	Fecal Coliform Bacteria
Park Branch*	LaGrange	Copper

\* Plan will be written by GA EPD

## II. GENERAL INFORMATION ABOUT THE WATERSHED

Write a narrative describing the watershed. Include an updated overview of watershed characteristics. Identify new conditions and verify or correct information in the TMDL document using the most current data. Include the size and location of the watershed, political jurisdictions, and physical features which could influence water quality. Describe the source and date of the latest land cover/use for the watershed. Describe and quantify major land uses and activities which could influence water quality. See the instructions for more information on what to include.

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**Watershed Characteristics, Size & Location:** Long Cane Creek Watershed (including Panther and Blue John Creeks) begins at the southern border of Lagrange and ends south of West Point. Long Cane Creek empties into the Chattahoochee River just south of the Troup County border in Harris County. The affected stream segment is 14 miles long; the watershed encompasses over 77 square miles. Soil type is predominately GA025 and the terrain is hilly with many areas unsuitable for development. Long Cane Creek is a large and complex watershed with many types of land use. There are seven NPDES permitted facilities in the watershed, two privately operated wastewater treatment facilities, and no drinking water intakes. Floods that occurred in 2003 may have exacerbated both bacteria and sedimentation problems.

**Land Use/ Land Cover:** The most current land cover data for the watershed was collected in 1995 for the TMDL. New land use data will be compiled in 2006 as part of Troup County's Comprehensive Plan update and should be used to revise this plan. Long Cane Creek is a large and complex watershed with many land uses ranging from undeveloped forest to intensive industrial development. Interstate 85 runs the length of the watershed and crosses the stream twice, once in the upper portion upstream of the confluence of Blue John Creek and another in the lower portion east of West Point. There are numerous secondary and dirt road crossings within the watershed. The upper watershed is rural residential east of LaGrange and heavily industrial, and commercial south of Lagrange. The mid and lower watershed is predominately forest and agriculture with increasing residential development.

### **Relevant Watershed Planning and Management Activities:**

**E & S Program:** Troup County is revising its Erosion and Sedimentation Control Ordinance to meet new state rules that require permits for land disturbing activity on sites more than one acre. Troup's Ordinance is administered by the County engineer in the Roads department.

**Georgia Forestry Commission Activities:** In an effort to minimize erosion and stream sedimentation from forestry practices, the GFC has an agreement with the Georgia Department of Natural Resources Environmental Protection Division (GADNR EPD) to educate the forest community and promote the use of forestry Best Management Practices (BMPs). A specially trained forester located in each of the 12 district offices statewide carries out this service.

Since January 2003, the GFC is conducting monthly BMP Assurance examinations in an effort to provide "reasonable assurance " that forestry operations are complying with the BMPs and meet any TMDL requirements. Active sites are identified through aerial or ground observations, requests by landowners, companies or operators, or by county tax records and then inspected for BMP implementation with the landowner's permission. This effort will hopefully educate landowners about BMPs and their responsibilities and liabilities with state water quality laws and also provide on-the-ground assistance to loggers or operators before potential problems occur.

## LONG CANE CREEK

COMPLETE THE FOLLOWING TABLES FOR AND NARRATIVES ABOUT EACH IMPAIRED STREAM IN THE WATERSHED.

STREAM SEGMENT NAME	LOCATION	MILES/AREA	DESIGNATED USE	PS/NS
Long Cane Creek	Troup County	14mi/ 77.94 sq mi.	Fishing	NS

### III. SOURCES AND CAUSES OF STREAM SEGMENT IMPAIRMENT LISTED IN TMDLs

After reviewing the TMDLs written for this stream, complete the following tables with **the information found in the TMDLs**. List each parameter for which the stream segment is impaired and the water quality standard violated. See the instructions for the water quality standards. Describe the sources and causes of each violation identified in the TMDLs.

**Table 2. SOURCES OF IMPAIRMENT AS INDICATED IN TMDLs**

PARAMETER 1	WQ STANDARD	SOURCES OF IMPAIRMENT	NEEDED REDUCTION FROM TMDL
Fecal Coliform	1,000 per 100 ml(geometric mean Nov-April) 200per 100ml (geo. mean May-Oct)	Leaking Sewer Lines, Land Application Systems, NPDES permitted sites, Landfills.See following section for possible nonpoint sources.	24%

PARAMETER 2	WQ STANDARD	SOURCES OF IMPAIRMENT* (As described by estimated percentage of total sediment load)	NEEDED REDUCTION FROM TMDL
Biota	No degradation to fish community	<p>* Tables 21 and 22 of <i>Total Maximum Daily Load Evaluation for 31 Stream Segments in the Chattahoochee River Basin For Sediment</i> lists 10 separate segments for Long Cane, Panther &amp; Blue John Creeks. For the purpose of this document the segments were aggregated into the three groups shown.</p> <p><u>Blue John Creek</u> : Row Cropping (74.77%), Low Density Res. (12.79%), Roads (10.09%), Other Grasses (.61%), High Intensity Com/Ind /Trans (.58%), High Density Res. (.54%), Pasture (.48%), Mixed Forest (.06%), Evergreen Forest (.05%), Decid. Forest (.04%)</p> <p><u>Long Cane Creek</u> : Row Cropping (70%), Quarries, Mines &amp; Gravel Pits (18.62%), Roads (4.74%), Low Density Res. (2.28%), Woody wetlands (1.45%), Other Grasses (1.28%), Pasture (.91%), Decid. Forest (.12%), Mixed Forest (.11%), Evergreen Forest (.10%), High Density Des. (.08%), Trnasitional (.07%), Emergent Wetlands(.01%)</p> <p><u>Panther Creek</u> : Quarries, Mines &amp; gravel Pits (62.59%), Row Crops (35.26%), Roads (1.22%), Pasture (.43%), Woody Wetlands (.19%), Low Density Res. (.11%), Decid. Forest (.06%), Mixed Forest (.04%), Evergreen Forest (.04%), High Intensity Com/Ind /Trans (.02%), Other Grasses (.01%)</p>	16%

#### IV. IDENTIFICATION AND RANKING OF POTENTIAL SOURCES OR CAUSES OF IMPAIRMENT

INVESTIGATE AND EVALUATE the sources of impairment for each parameter listed in Table 2. Write a narrative describing efforts made or procedures used to verify the significance and extent of the sources or causes of each impairment listed in the TMDLs. Include:

- Involvement of stakeholder group
  - Field surveys
  - Review of land cover data
  - Evaluation of sources
- 

##### FECAL COLIFORM

**NOTE:** the TMDL does not identify probable non point sources specific to Long Cane Creek. The non point sources in the following list were compiled using general information from the TMDL that could be applied to Long Cane Creek. Sampling for fecal coliform was conducted at one sampling point on Webb Road in the lower watershed (biomonitoring was conducted at 11 sampling points). Because of the limited data and the large size of the watershed, it is difficult to determine the probable contribution of individual sources. The elevated fecal loads at this point could represent the cumulative affects of many sources or the severe affects of a few sources. Long Cane Creek will be monitored by EPD in 2005. It is recommended that additional sampling points be added at that time to provide an understanding of fecal loads in other portions of the watershed.

##### POINT SOURCES

Leaking Sewer Lines: Sewer lines serving Lagrange Utilities run parallel to Blue John Creek. Although no leaks have been detected in the area, any leaks would have a significant impact on fecal coliform counts.

Land Application Systems One permitted LAS is operated by Days Inn in Lagrange. The TMDL states that NPDES point source fecal coliform loads from wastewater treatment facilities do not significantly contribute to the impairment unless repeated violates occur.

Landfills: One Construction & Demolition, and one sanitary landfill active, two sanitary landfills closed.

NPDES Permitted Sites: Long Cane Creek Water Pollution Control Plant does not discharge into Long Cane Creek but sewer lines do run along the creek in the upper watershed. The Whitefield and Miliken sites have repeated reporting violations, making it difficult to determine if they have violated fecal limits.

##### NON POINT SOURCES

Wildlife: Beaver & Deer: Several stakeholders expressed concern over the high beaver population in portions of the Creek. Troup also has a high deer population (50 deer/square mile). Since large portions of the mid and lower watershed are forested, wildlife could have an impact on fecal loads.

Agricultural Livestock: Troup has a moderate number of dairy cattle and horses. There are no confined animal feeding lots. Several agency stakeholders stated that cattle farmers within the watershed have low-density operations. Several of the 1999 biomonitoring reports identify cattle production as one of the main contributors to fish community and habitat impairment. Since there is a significant amount of cattle production in the

watershed, and since it is customary for cattle to have direct access to stream in this area, livestock could be contributing to the fecal loads. There are no current chicken or hog producers in the watershed.

Leaking Septic Systems: The majority of Troup County uses septic systems. This includes all new subdivision development in the mid to lower watershed. The growth in the number of septic tanks due to increased residential development in the watershed should be a primary concern for future water quality.

## **BIOTA/ SEDIMENT**

### **NOTES:**

Tables 21 and 22 of *Total Maximum Daily Load Evaluation for 31 Stream Segments in the Chattahoochee River Basin For Sediment* lists data for 10 separate segments for Long Cane, Panther & Blue John Creeks. For the purpose of this document data from all segments has been aggregated. The narrative below states which part of the stream is most affected by each land use.

The *Total Maximum Daily Load Evaluation for 31 Stream Segments in the Chattahoochee River Basin For Sediment* states that based on findings, "it was determined that most of the sediment in the Chattahoochee River Basin streams is due to 'legacy' sediment. Therefore it is recommended that there be no net increase in sediment ....in order that these streams recover over time"(pg. 64). Although this indicates that the emphasis should focus on avoiding future and current erosion rather than to determining the cause of the existing impairment, land use in the watershed suggests that this current load is significant.

The biomonitoring data collected in 1999 at eleven sites in the watershed indicate high degrees of sediment and poor stream conditions from the extreme upstream point on Panther Creek to the extreme downstream point near West Point. During field surveys, CFRDC staff observed many current causes of erosion that are described below. If current conditions are improved or corrected, it would likely take many years or decades for the stream to heal.

### **Evaluation of Sources Listed in the TMDL**

Low Density Residential: The TMDL attributes 4.09% of land use and 2.62% of the sediment load to this land use. Low-density residential development is increasing throughout the watershed. During the May & June 2004 field survey CFRDC staff observed numerous construction sites with ineffective or failing controls. An area of particular concern was on Lovelace Road in the Panther Creek area. New residential development and poorly managed construction sites appear to be contributing large amounts of sediment to the watershed.

Roads: the TMDL attributes 4.73% of the sediment load to roads. Because the watershed is urbanized it contains many paved and dirt roads that have an impact on sediment load. Interstate 85 runs the length of the watershed and crosses the stream twice, once in the upper portion upstream of the confluence of Blue John Creek and another in the lower portion east of West Point. There are numerous secondary and dirt road crossings within the watershed. During the field surveys CFRDC staff noted dirt roads in poor condition leading to the creek beside bridge crossings. Steep embankments that rise up over the road flank many roads in the watershed. During the field surveys CFRDC staff observed many embankments that were not vegetated, unstable and eroding. The high velocity and concentration of stormwater discharged into the creek by paved roads helps to maintain unstable conditions. The majority of the 1999 biomonitoring reports

for this creek attribute some of the impairment to urban runoff. Based on the prevalence of roads, the biomonitoring reports and conditions noted during field surveys, roads have a larger contribution to sediment load than indicated in the TMDL.

High Intensity Commercial/Industrial: the TMDL attributes 2.70% of land use and less than 1% of the sediment load to this land use. A portion of the upper watershed is an industrial park that contains over 35 major industries and 20 support services. The industrial park is currently 1700 acres. Troup County has plans to develop more industrial land in the area. The watershed also contains an airport and a major transportation corridor and a railroad line. The majority of the 1999 biomonitoring reports for this creek attribute some of the impairment to stormwater surges caused by urban runoff. During the field surveys it was noted that many industries in the park are in the process of expanding their facilities. Staff observed large stockpiles of unprotected dirt and poor erosion controls on construction sites. This land use has a larger contribution to sediment load than is indicated in the TMDL. This is due to the size of the park and the large amount of land disturbing activity observed and the presence of major transportation corridors.

High Density Residential the TMDL attributes less than 1% of land use and sediment load to this land use. No high density residential was observed during field surveys in May & June 2004. The County Planning & Zoning Department has no record of high-density areas in the watershed. Therefore, This amount of land use and sediment contribution seems accurate.

Row Cropping: the TMDL attributes 4.98% of land use and 67.59% of the sediment load to this land use. Several stakeholders stated that the actual acreage is lower than 4.98%. No row cropping was observed during field surveys in May 2004 and June 2004.

Quarries, Mines & Gravel Pits: the TMDL attributes less than 1% of land use and 21.05% of the sediment load to this land use. At the time of this report there was one active stone quarry in the watershed. Stakeholders from the mining industry stated that the acreage of mining (886.85 acres) is too high. Biomonitoring data collected in 1999 shows little difference in stream conditions upstream and downstream from one of the main mining sites in the watershed. It states "Overall fish community integrity improved downstream of Vulcan's discharge, indicating no apparent adverse affects. "

Pasture: the TMDL attributes 9.04% of land use and .85% of sediment load to this land use. Information from stakeholders suggests that the percentage of land use is accurate. Several of the 1999 biomonitoring reports identify cattle production as one of the main contributors to fish community and habitat impairment. Since there is a significant amount of cattle production in the watershed, and since it is customary for cattle to have direct access to stream in this area, this land use must have a higher contribution to the sediment load than is stated in the TMDL.

Forest: the TMDL attributes 70.4% of land use and less than 1% of sediment load to forest. Field observations and information from stakeholders suggest that the percentage of land use is accurate. At this time there is no data about how many acres are in active forestry within the watershed. No active forestry was observed during field surveys in May 2004 and June 2004. The Georgia Forestry Commission's 2002 Compliance Report for Troup County shows a very high degree of compliance. Although it is not known if any of the properties surveyed were in the watershed, the results suggest that timber harvesters in the county are correctly using forestry BMPs. For the purpose of this Implementation Plan it is assumed that the TMDL data is correct.

Woody Wetlands: the TMDL attributes 4.19% of land cover and 1.29% of the sediment load to this category. The percentage of land use is consistent with wetlands data collected in 1999 for a Regional Environmental Database produced by CFRDC. One stakeholder stated that wetlands in the lower portion of the creek had decreased in recent years. Several landowners stated that portions of their properties had

become unusable due to increased wetlands created by beavers. For the purpose of this Implementation Plan it is assumed that the TMDL data is correct.

Transitional: the TMDL attributes less than 1% of land cover and sediment load to this category. At this time there is no further data about this land cover category. For the purpose of this Implementation Plan it is assumed that the TMDL data is correct.

Emergent Wetlands: the TMDL attributes less than 1% of land cover and sediment load to this category. Several landowners stated that portions of their properties had become unusable due to increased wetlands created by beavers. At this time there is no further data about this land cover category. For the purpose of this Implementation Plan it is assumed that the TMDL data is correct.

Other Grasses: the TMDL attributes 2.16% of land use and 1.28% of sediment load to this category. At this time there is no further data about this land cover category. For the purpose of this Implementation Plan it is assumed that the TMDL data is correct.

**Evaluation of possible sources not listed in the TMDL that were identified during this evaluation:**

Unregulated Dumping Sites: During field surveys in May 2004 and June 2004, CFRDC staff observed numerous sites with "Fill Dirt Wanted" signs that had severe erosion and minimal or ineffective erosion controls. Staff witnessed the dumping of general construction debris on these sites.

To the extent possible, identify sources and quantify the extent of pollution in the stream segment for each of the parameters listed in Table 2 and evaluate the likely impact on the parameter load to the stream. This should follow research performed and described in preceding narrative and should correct or add information to the TMDLs. **The *SOURCES SHOULD BE RANKED*** from those having the most impact to those having the least impact. The estimated extent of contribution can be expressed as the area of the watershed effected, the stream miles effected, or the number of activities contributing to the problem. The magnitude of contribution should be estimated to be large, moderate, small, or negligible.

**Table 3. CONCLUSIONS MADE OF POTENTIAL SOURCES OF STREAM SEGMENT IMPAIRMENT**

PARAMETER 1	POTENTIAL SOURCES*	ESTIMATED EXTENT OF CONTRIBUTION*	ESTIMATED MAGNITUDE OF CONTRIBUTION*	COMMENTS
Fecal Coliform	Leaking Septic Systems	Throughout	Moderate	
	NPDES Permitted Sites	Upper watershed	Moderate to small	Depends if violations occur
	Agricultural Livestock	Mid to lower watershed	Moderate	
	Wildlife	Mid to lower watershed	Moderate	
	Leaking Sewer Lines	Upper watershed	Small to moderate	No known leaks
	Landfills	Upper watershed	Small	
	Land Application Systems	Days Inn	Small	

\*Sampling for fecal coliform was conducted at one sampling point on Webb Road in the lower watershed (biomonitoring was conducted at 11 sampling points). Because of the limited data and the large size of the watershed, it is difficult to determine the probable contribution of individual sources. The elevated fecal loads at this point could represent the cumulative affects of many sources or the severe affects of a few sources. Long Cane Creek will be monitored by EPD in 2005. It is recommended that additional sampling points be added at that time to provide an understanding of fecal loads in other portions of the watershed.



PARAMETER 2	POTENTIAL SOURCES	ESTIMATED EXTENT OF CONTRIBUTION	ESTIMATED MAGNITUDE OF CONTRIBUTION	COMMENTS
Biota/ Sediment	Low Density Residential	Mid to lower watershed	Large	
	Roads	Throughout	Large	
	High Intensity Commercial / Industrial	Upper watershed	Large	
	Unregulated Dumping Sites*	Upper watershed	Large	
	Pasture	Mid to lower watershed	Moderate	
	Quarries Mines & Gravel Pits	Upper watershed	Small	Biomonitoring report indicated no adverse affects
	Forest	Mid to lower watershed	Negligible	No evidence of active forestry. EPA identifies siculture as the lowest contributor to nonpoint pollution.
	Woody Wetlands	Mid to lower watershed	Negligible	
	Transitional	Mid to lower watershed	Negligible	
	Emergent Wetlands	Mid to lower watershed	Negligible	
	Other Grasses	Upper Watershed	Negligible	

\* **Potential Source not identified in TMDL.** Source was found to be a potential contributor during the course of this assessment.

## V. STAKEHOLDERS

PUBLIC INVOLVEMENT AND THE ACTIVE PARTICIPATION OF STAKEHOLDERS is essential to the process of preparing TMDL implementation plans and improving water quality. Stakeholders can provide valuable information and data regarding their community, impaired water bodies, potential causes of impairments, and management practices and activities which may be employed to reduce the impacts of the causes of impairment.

Describe outreach activities to advise and engage stakeholders in the TMDL implementation plan preparation process. Describe the stakeholder group employed or formed to address the impaired segments in the watershed. Summarize the results of the number of attendees and meetings and describe major findings, recommendations, and approvals.

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Stakeholders were notified of the project by mail. An article describing the project also appeared in all the local newspapers. The letter received by individual stakeholders and the article described three ways for interested parties to engage in the process; 1) attend one of five county stakeholder meetings, 2) contact CFRDC staff directly through e-mail or by phone, and 3) view and comment on the draft plans on the CFRDC website between June 28<sup>th</sup> and July 14<sup>th</sup> 2004.

**Press Releases:** Two Press Releases ran in local newspapers during the course of the project. The first ran in early May 2004. It alerted readers to the project, meeting times and ways to participate. The second ran in early October 2004. It gave an update on the project and asked for participation through direct contact with staff or by reviewing the plans on CFRDC's website.

**Meetings:** Meetings were held in each of CFRDC's five counties (see Attachment). CFRDC staff developed presentation boards for the meetings that contained a map of each of the nine affected streams, land use data that had been provided in the TMDL, and preliminary findings, if any. Sampling data was also provided for all the streams. After a short presentation, participants were asked to examine and comment on the data and offer insight into current watershed conditions. Participants were supplied with comment sheets. Several landowners and representatives of business and industry attended the Troup County meeting. Stakeholders from Meriwether County, the Georgia Forestry Commission, the NRCS and other agencies with an interest in Long Cane Creek Watershed attended the Troup County Meeting. Information about all nine watersheds was presented at each meeting because many stakeholders had an interest in watersheds in more than one county.

**Comments from Website:** the nine TMDL Implementation Plans were posted on CFRDC's website on June 28<sup>th</sup> 2004 for the purpose of receiving comment. Stakeholders who attended meeting of contacted CFRDC staff directly were asked to visit the website and comment on the draft plans.

**Advisory Group:** CFRDC formed a Water Issues Committee (WIC) in 2000 for the purpose of guiding the agency on TMDL, Source Water Assessment Plans and other water related issues. The WIC consists of two or more representatives from each county who were appointed by the local governments. During this TMDL process, this group met in mid July 2004 to review draft plans and develop public outreach activities.

## Major Findings and Comments from Stakeholder Involvement

### Comments as received on Comment Sheets at meetings:

QUESTION: Does the information provided about land use seem accurate? If not, how is it different?

"There is no mention of beavers, which are the biggest contributor to the build up of sediment and the increased chances for coliform growth."

"No, row crops are not as big in the area as indicated."

QUESTION: Do you know of any event or human caused changes in the watershed over the last 5 years that might have had a positive or negative impact on the pollution problem?

"Beavers"

"The placing of beavers in the county and surrounding counties happened more than 5 years ago, but is the major contributor to the problems in Lone Cane Creek."

"Big flood last May (2003)"

"Development dirt roads that are not maintained."

### ADDITIONAL COMMENTS:

"Hamilton Rd. crosses creek. Clear out creek. Full of trees and stumps. Start farther down to allow flow. Beaver problem. Flood gates".

"City of LaGrange is contracting with engineering firms to do a watershed assessment and protection plan for everything in the city limits. This required by our NPDES to be completed within 3.5 years. Monitoring will begin in October. There is a small privately owned treatment plant on Long Cane Creek near the interstate interchange. It serves the truckstops, McDonalds, etc. It is operated by Harmon Engineering in Auburn, AL. " (Can call Anne Westmoreland 883-2150 for their phone number)

"The Days Inn also operates a treatment plant of it's own."

"City of LaGrange Sewers do not extend much beyond Pegasus Parkway."

"We are unable to use our part of the creek because the water is backup because of the beaver dams and the resulting debris caused by this. Trees have been killed and have fallen everywhere. Hay fields have been lost; pastures no longer exist; part of our land across the creek is not available to us."

“Troup County Work Camp - Septic system - not on city sewage.”

“State Work Camp - same situation Hamilton rd.”

“Any help to clean up the creek would be appreciated.”

“The 789 acres of quarry, mining and gravel pits seems extremely high. Our permitted area is 250 acres of which 80 acres is disturbed. We have a fifty foot stream buffer on each side and the three NPDES points we have we sample bi-weekly for TSS and PH and have never been out of compliance with GEPD or EPD standards. Therefore the 19% contribution listed on the sheet for pollution contribution for quarries, mining and gravel pits seems extremely high.”

“Any human activity usually has some negative impact and always will. Hopefully the impacts have been lessened by education, monitoring, and minimum laws.”

“More ground pounding needs to be done by the people that can get things done. Seeing the presence of GFC, EPD in a friendly way helps much. Too much of what is seen of EPD is only on TV or in a few law enforcement cases.

More ground pounding needs to be done by people gathering and using the data for watershed management plans. Using satellite imagery is great for figuring land use statistics only as long as it is checked on the ground.

Consideration has to be given to the fact that it took hundreds of years of human misuse to cause our problems we see today and no law or education is going to change things in only a few years. We as citizens need to get serious about solving the problems instead of just looking like we are solving them. There is more talk, monitoring, and laws about soil disturbances than ever, but nearly every construction site I see is still putting silt in streams because of improper installation or maintenance of sediment control structures. Sometimes just the installation of silt fence causes a major problem. These comment sheets are a good start if used.”

“I have reviewed the Tier 2 plan you gave me at the WIC meeting. I don’t have any specific comments on it. I think you did a good job with the resources available. It’s just going to be hard to accomplish any real improvements in the areas where there is no enforcement authority or money for implementation.”

List the watershed or advisory committee members of the stakeholder group for this segment in the following table.

**Table 4. COMMITTEE MEMBERS**

NAME/ORG	ADDRESS	CITY	ST	ZIP	PHONE (W)	PHONE (H)
Denny Ivey/CFRDC Water Issues Committee	103 Carroll Circle	Carrollton	GA	30117	770-832-2171	
Brenda Rice/CFRDC Water Issues Committee	300 Old Goldmine Road	Villa Rica	GA	30180	770-830-6673	
Loren McCune/CFRDC Water Issues Committee	PO Box 428	Newnan	GA	30264	770-253-2020	770-253-9357
David Brown/CFRDC Water Issues Committee	1770 Al Robert Road	Senoia	GA	30276		770-599-1830
Robert Blackburn/CFRDC Water Issues Committee	200 Joe Ben Lee Road	Newnan	GA	30263	770-253-6990	770-253-6728
Bob Jones/CFRDC Water Issues Committee	252 Jones Road	Franklin	GA	30217	706-675-3053	706-675-3049
Doug Craven/CFRDC Water Issues Committee	2404 Armstrong Mill Road	Franklin	GA	30217		770-854-8186
C.E. Withrow/CFRDC Water Issues Committee	940 Linda Lane	Manchester	GA	31816	706-846-3525	
Bill Tomlin/CFRDC Water Issues Committee	807 McCurdy Boulevard	Manchester	GA	31816		706-846-2717
A.J. McCoy/CFRDC Water Issues Committee	571 Alvaton Road	Gay	GA	30218	404-506-0919	772-927-9055
Arthur Holbrook/CFRDC Water Issues Committee	215 Cofield Road	LaGrange	GA	30240		706-884-7905
Buck Davis/CFRDC Water Issues Committee	1134 Young's Mill Road	LaGrange	GA	30240		706-884-1621
David Brown/CFRDC Water Issues Committee	Post Office Box 430	LaGrange	GA	30241	706-883-2000	

In Appendix A, list the names, addresses, telephone numbers, and e-mail addresses for local governments, agricultural or commercial forestry organizations, significant landholders, businesses and industries, and local organizations including environmental groups and individuals with a major interest in this watershed.

## VI. MANAGEMENT MEASURES AND ACTIVITIES

Describe any management measures or activities that have been put into place or will be put into place including regulatory or voluntary actions or other controls by governments or individuals that specifically apply to the pollutant that will help achieve water quality standards. Include who will be responsible for the measure, how it will be funded, the status, the date it will be or was initiated, and a short description of how effective the measure is or will be.

**Table 5. MANAGEMENT MEASURES AND ACTIVITIES**

### GENERAL MEASURES APPLICABLE TO ALL PARAMETERS

MEASURE	RESPONSIBILITY	DESCRIPTION	SOURCE OF FUNDING	STATUS	ENACTED/ IMPLEMENTED	EFFECTIVENESS (Very, Moderate, Weak)
NPDES Permitting	EPD Permittee	Permittee monitors discharges to determine if they are within allowable limits and files a report to EPD	State Permittee	Underway		Moderate if violations are minimal
NRCS BMP Programs	NRSC Property Owner	Various voluntary programs to assist landowners with BMPs	Federal Property Owner	Underway		Very
Public Outreach	CFRDC	CFRDC will distribute findings of Implementation Plans to local governments, agencies and citizen groups	Local	Planned	Sept-Dec. 2004	Moderate
Adopt-A-Stream	CFRDC	CFRDC will work extension agents to establish Adopt-a-Stream groups in the region.	Local	Planned	2005	Moderate

**MEASURES APPLICABLE TO FECAL COLIFORM**

MEASURE	RESPONSIBILITY	DESCRIPTION	SOURCE OF FUNDING	STATUS	ENACTED/IMPLEMENT-ED	EFFECTIVENESS (Very, Moderate, Weak)
Compliance with NPDES Permitting Requirements	EPD Permittee	Permittee monitors discharges to determine if they are within allowable limits and files a report to EPD	State Permittee	Underway		Moderate if violations are minimal
NRCS Conservation Programs	NRSC Property Owner	Various voluntary programs to assist landowners with BMPs	Federal Property Owner	Underway		Very
Public Outreach	CFRDC	CFRDC will distribute findings of Implementation Plans to local governments, agencies and citizen groups	Local	Planned	Sept-Dec. 2004	Moderate
Adopt-A-Stream	CFRDC	CFRDC will work extension agents to establish Adopt-a-Stream groups in the region.	Local	Planned	2005	Moderate

## MEASURES APPLICABLE TO BIOTA / SEDIMENT

MEASURE	RESPONSIBILITY	DESCRIPTION	SOURCE OF FUNDING	STATUS	ENACTED/ IMPLEMENTED	EFFECTIVENESS (Very, Moderate, Weak)
Implementation of E & S Ordinance	Troup County	Requires erosion control plans for all new development over 1.1 acres	County	Underway	Summer 2004	Very effective if properly enforced.
NPDES Permitting	EPD Permittee	Permittee monitors discharges to determine if they are within allowable limits and files a report to EPD	EPD Permittee	Underway		Very.
Georgia's Better Back Road Program	Rolling Hills RC&D Council	Demonstration sites, Statewide training & publication of <i>Unpaved Road Maintenance Manual</i>	Federal & State	Underway	Project runs from spring 2004 to spring 2005	Very
Implementation of GFC's Forestry BMPs	GFC, Landowners	Inform landowners, foresters, timber buyers, logger site and reforestation effective practices contractors and others about commonsense, economical and effective practices to minimize nonpoint pollution	GFC	Underway	1997	Moderate to weak. EPA identifies siculture as the lowest contributor to np pollution.
GFC Monthly BMP Assurance Exams	GFC	GFC offers monthly assurance exams of active sites, particularly those located in impaired watersheds.	GFC	Current	Jan 2003	Moderate to weak. EPA identifies siculture as the lowest contributor to np pollution.
NRSC Programs	NRSC Property Owner	Various voluntary programs to assist landowners with BMPs	Federal Property Owner	Underway		Very
Public Outreach	CFRDC	CFRDC will distribute findings of Implementation Plans to local governments, agencies and citizen groups.	Local	Planned	Sept-Dec. 2004	Moderate
Adopt-A-Stream	CFRDC	CFRDC will work extension agents to establish Adopt-a-Stream groups in the region.	Local	Planned	2005	Moderate



## VII. MONITORING PLAN

The purposes of monitoring are to obtain more data, to determine the sources of pollution, to describe baseline conditions, and to evaluate the effects of management and activities on water quality. Describe any sampling activities or other surveys - active, planned or proposed - and their intended purpose. Reference the development and submission of a Sample Quality and Assurance Plan (SQAP) if monitoring for delisting purposes.

**Table 6. MONITORING PLAN**

PARAMETER(S) TO BE MONITORED	ORGANIZATION	STATUS (CURRENT, PROPOSED, PLANNED)	TIME FRAME		PURPOSE (If for delisting, date of SQAP submission)
			START	END	
ALL	EPD	Planned	2005	2005	Basin Monitoring
All	City of Lagrange	Planned	2008	ongoing	NPDES Permit

## VIII. PLANNED OUTREACH FOR IMPLEMENTATION

List and describe outreach activities which will be conducted to support this plan and the implementation of it.

**Table 7. PLANNED OUTREACH**

RESPONSIBILITY	DESCRIPTION	AUDIENCE	DATE
CFRDC	TMDL section on CFRDC web page will contain all Implementation Plans, information about the TMDL process, links to other web pages and an area for comments	Local governments and some citizens	Starts July 2004 and continues indefinitely
CFRDC	News releases in all local papers when final plans are approved	Residents and stakeholders	December 2004

## IX. MILESTONES/ MEASURES OF PROGRESS OF BMPs AND OUTREACH

This table will be used to **track and report progress of management measures including BMPs and outreach**. Record milestone dates for:

- accomplishment of management practices or activities
- outreach activities
- installation of BMPs

to attain water quality standards. Comment on the effectiveness of the management measure, how much support the measure was given by the community, what was learned, how the measure might be improved in the future, and any other observations made. This table can be "pulled out" of this template and used to report and track progress.

**Table 8. MILESTONES**

MANAGEMENT MEASURE	RESPONSIBLE ORGANIZATIONS	STATUS		COMMENT
		PROPOSED	INSTALLED	
Implementation of E & S Ordinance	Troup County	Revised 2004	Adopted 2004	
NPDES Permitting	EPD Permittee	N/A	A/A	Ongoing Program
Georgia's Better Back Road Program	Two River RC&D Council	2003	2005	Demonstration sites, Statewide training & publication of <i>Unpaved Road Maintenance Manual</i>
Implementation of GFC's Forestry BMPs	GFC, Landowners	N/A	N/A	Ongoing
GFC Monthly BMP Assurance Exams	GFC	N/A	2002	On going
NRSC Programs	NRSC Property Owner	N/A	2002	On going Program
TMDL Section on CFRDC Website	CFRDC	May 2004	July 2004	On-going
Adopt-A-Stream	CFRDC	May 2004		In collaboration with Troup Co. Extension Service

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Date Submitted to EPD:	November 30 2004	Revision:	

APPENDIX A.

STAKEHOLDERS

List the names, addresses, telephone numbers, and e-mail addresses for local governments, agricultural or commercial forestry organizations, significant landholders, businesses and industries, and local organizations including environmental groups and individuals with a major interest in this watershed.

NAME/ORG	ADDRESS	CITY	STATE	ZIP	PHONE	E-MAIL
Mr. Frank Sullivan Coweta County Cattlemen's Association	354 Donald Lamb Road	Moreland	GA	30259	-NA-	-NA-
Mr. Robert Tolleson Coweta County - Planning and Zoning	22 East Broad Street	Newnan	GA	30263	-NA-	-NA-
Mr. Wayne Kennedy Coweta County - Development and Engineering	22 East Broad Street	Newnan	GA	30263	-NA-	-NA-
Mr. Render Ward Coweta County Extension Service	21 East Washington Street	Newnan	GA	30263	-NA-	-NA-
Ms. Pat Miolen Coweta County Adopt-A-Stream	21 East Washington Street	Newnan	GA	30263	-NA-	-NA-

**APPENDIX B.**

**UPDATES TO THIS PLAN**

Describe any updates made to this plan. Include the date, section or table updated, and a summary of what was changed and why.

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**APPENDIX B.**  
**Exhibits**

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**Image 1a.** Residential development construction on Lovelace Road



**Image 1b.** Residential development construction on Lovelace Road



**Image 2.** Erosion at entrance of newly constructed subdivision



**Image 3.** Eroding road leading to Long Cane Creek



**Image 4.** Unstable embankments along roads are common throughout the watershed



**Image 5.** Motor Speedway with large areas of bare and cleared ground and no erosion controls